



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

August 21, 2020

**Via Electronic Mail**

Charlotte Katzenmoyer  
Chief Executive Officer  
Capital Region Water  
212 Locust Street, Suite 500  
Harrisburg, Pennsylvania 17101  
[Charlotte.Katzenmoyer@capitalregionwater.com](mailto:Charlotte.Katzenmoyer@capitalregionwater.com)

RE: U. S and PADEP v. Capital Region Water and City of Harrisburg  
Civil Action No. 1:15-cv-00291-WWC

Dear Ms. Katzenmoyer:

On behalf of the United States Environmental Protection Agency (EPA) and the Pennsylvania Department of Environmental Protection (PADEP), we write in response to your June 2, 2020 letter regarding Capitol Regional Water's (CRW) *City Beautiful H2O Program Plan Long-Term Control Plan* (LTCP or Plan). As you know, the parties have long been discussing the path to an approvable LTCP that meets 85% capture system-wide and attains applicable water quality standards. While we feel we have made progress these last months, it has become apparent that, given the age and condition of the system, CRW will need to first implement some interim projects in an effort to bridge the gap for the 85% capture goal set forth in the CSO policy.

EPA has reviewed CRW's proposed projects set forth in the prior presentations and has some additional questions regarding their implementation which are set forth in the attachment to this letter. We suggest another technical meeting with the parties to discuss these questions. When the remaining information has been provided, the parties can reconvene with their respective counsel to decide how to best formalize the agreed upon work.

Once our path forward has been determined, the Agency recommends some opportunity for public participation given that there has been no public outreach for several years and the CSO policy requires public engagement at every significant step.

We would like to schedule a follow up meeting in September. Please contact Steve Maslowski at [Maslowski.steven@epa.gov](mailto:Maslowski.steven@epa.gov) with potential meeting dates upon receipt of this letter.

EPA looks forward to CRW's development of an approvable LTCP that meets all the conditions of the CSO Policy and believes the projects being discussed by the parties will be a good step forward in achieving that goal. If you have technical questions regarding this matter, please contact me at (215) 814-5173. Thank you for your attention to this matter.

Sincerely,

STACIE  
PRATT

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STACIE PRATT  
Date: 2020.08.21  
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Stacie Pratt, Chief  
NPDES Section  
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## Capital Region Water Questions

Questions and Comments resulting from CRW's July 23, 2020 presentation. Please provide this information prior to the next scheduled technical meeting

1. EPA requests that CRW provide an updated Hydraulic & Hydrology Model Report with calibration and validation parameters that meet the standards set in the Water Environmental Federation Manual of Practice FD-17.
2. CRW has discussed the rehabilitation of the Front Street Interceptor since at least August 2018 with either Cured-in-Place Pipe (CIPP) restoration or segmented non-circular slip lining rehabilitation. When will CRW make its decision on the approach they will take? To what extent does the interceptor project reduce CSO overflows volume and frequency?
3. EPA and PADEP request that CRW provide documentation that the GI/Decentralized Grey approach is the most cost effective. CRW should exam approaches in the same cost range as what has been proposed, but with a shorter timeframe. In addition, the Agencies are requesting CRW provide a more detailed implementation schedule for this approach.
4. Given the impossibility of predicting future interest rates, improvements in technology, cost of materials, and other unknown factors that may impact the POTW, the Agencies are looking at adaptive management strategies to reach 85% system-wide capture. Therefore, The Agencies would prefer CRW focus on projects for the next ten years that will increase capture and work toward getting the system to baseline. Please provide a timeline for the priority projects (for the next 10 years) discussed from inception to construction completion and the timeframe within which CRW plans to initiate and complete its Sewer System Renewal, Short-Term Implementation, and Sewer Separation of Small High Frequency Catchments projects.

